

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

ANDREW L. COLBORN,

Plaintiff

NETFLIX, INC.,
CHROME MEDIA, LLC, f/k/a
SYNTHESIS FILMS, LLC,
LAURA RICCIARDI, and
MOIRA DEMOS,

Case No. 19-CV-484

Defendants.

SUPPLEMENTAL DECLARATION OF MICHAEL GRIESBACH

I, Michael Griesbach, declare under penalty of perjury as follows:

1. I am one of the plaintiff's attorneys in this action.
2. I have compared the published news and entertainment articles listed below, which are copied in their entirety in the attached Exhibit A, with the URL assigned to each of them on the World Wide Web and attest that they are true and accurate copies of the publications as they appear online. The brief excerpts included below are true and accurate quotations from the articles they are attributed to.
 - *Rolling Stone*, December 18, 2018
"Making a Murderer' Detective Sues Netflix for Allegedly Framing Steven Avery"
<https://www.rollingstone.com/tv/tv-news/making-a-murderer-detective-andrew-colborn-sue-netflix-defamation-770538/>

"Along with Netflix, 'Making a Murderer' directors Laura Ricciardi and Moira Demos are named as defendants, along with Netflix executives Lisa Nishimura and Adam Del Deo and editor Mary Manhardt."
 - *Hollywood Reporter*, December 17, 2018
"Making a Murderer' Filmmakers Sued by Former Wisconsin Police Sergeant"
<https://www.hollywoodreporter.com/thr-esq/making-a-murderer-filmmakers-sued-by-wisconsin-police-sergeant-1170157>

- BuzzFeedNew*, December 19, 2018
 “A Detective Featured In “Making A Murderer” Is Suing Netflix For Defamation”
<https://www.buzzfeednews.com/article/michaelblackmon/making-murderer-netflix-detective-lawsuit>

“Representatives for Ricciardi and Demos did not immediately respond to BuzzFeed News’ request for comment. A Netflix spokesperson said the company had no comment.”
- Forbes*, December 21, 2018
 “Retired Police Officer Sues Netflix Over Portrayal In ‘Making a Murderer’”
<https://www.forbes.com/sites/michellefabio/2018/12/21/retired-police-officer-sues-netflix-over-portrayal-in-making-a-murderer/#684f016f1dcf>

“The complaint, filed in Manitowoc County Circuit Court in Wisconsin, names directors Laura Ricciardi and Moira Demos, editor Mary Manhardt and Netflix executives Lisa Nishimura and Adam Del Deo among the defendants.”
- The Wrap*, December 17, 2018
 “‘Making a Murderer’ Filmmakers Sued for Defamation by Former Wisconsin Police Sergeant”
<https://www.thewrap.com/making-a-murderer-filmmakers-sued-for-defamation-by-former-wisconsin-police-sergeant/>

“Representatives for Ricciardi and Demos did not immediately respond to TheWrap’s request for comment; Netflix declined comment.”
- Hollywood Reporter*, January 17, 2019
 “Inside a ‘Making a Murderer’ Lawsuit and the Hidden Dangers of TV’s True-Crime Craze”
<https://www.hollywoodreporter.com/features/inside-a-making-a-murderer-lawsuit-hidden-dangers-true-crime-tv-1176395>

“Netflix declined comment to THR and has until Jan. 31 to respond to Colborn's complaint in court.”
- Fox 11 News*, Dec 2018
 “Manitowoc Co. investigator suing Netflix, filmmakers for portrayal in ‘Making a Murderer’”
<https://fox11online.com/news/local/manitowoc-co-investigator-suing-netflix-due-to-portrayal-in-making-a-murderer>

“Fox 11 reached out to Netflix, who did not have a comment.”

- *The Hill*, December 18, 2019
 “Detective in 'Making a Murderer' files defamation lawsuit against Netflix, producers”
<https://thehill.com/blogs/blog-briefing-room/news/421896-detective-in-making-a-murderer-files-defamation-lawsuit-against>
 “Netflix declined to comment to *The Hill*.”
- *USA Today*, Dec. 17, 2018
 “Detective featured in 'Making a Murderer' sues Netflix for defamation”
<https://www.usatoday.com/story/life/tv/2018/12/17/detective-featured-making-murderer-sues-netflix-defamation/2342953002/>
 “Emails to Netflix general media email inbox not immediately returned; e-mail to media relations service for Demos and Ricciardi not immediately returned.”
- *New York Post*, December 18, 2019
 “Ex-detective Andrew Colborn sues Netflix over ‘Making a Murderer’”
<https://nypost.com/2018/12/18/ex-detective-andrew-colborn-sues-netflix-over-making-a-murderer/>
 “Online court records didn't list Netflix's attorneys as of late Monday afternoon. A message left in the company's general media email inbox wasn't immediately returned. An email left with Ricciardi and Demos' media relations service wasn't immediately returned, either.”
- *WBAY Action News*, December 17, 2019
 “Avery case investigator sues Netflix, 'Making a Murderer' filmmakers”
<https://www.wbay.com/content/news/Steven-Avery-detective-sues-Netflix-Making-a-Murderer-filmmakers-502963021.html>
- *Rolling Stone*, December 19, 2018
 “Steven Avery’s Attorney Calls Ex-Cop’s Lawsuit ‘Early Christmas Present’”
<https://www.rollingstone.com/culture/culture-news/steven-avery-making-a-murderer-lawsuit-netflix-colborn-zellner-771241/>
- *Newsweek*, December 20, 2018
 “‘Making a Murderer’: Kathleen Zellner Says Colborn Lawsuit is an ‘Early Christmas Gift’”
<https://www.newsweek.com/making-murderer-kathleen-zellner-says-colborn-lawsuit-early-christmas-gift-1266726>

3. The majority of the articles listed above contain a hyperlink granting the reader immediate access to the original summons and complaint filed in this action.
4. The original Complaint in this action was also made publicly available online in December 2018 through the article that appears on this url:
<https://www.wbay.com/content/news/Steven-Avery-detective-sues-Netflix-Making-a-Murderer-filmmakers-502963021.html>
5. Given the extensive reporting concerning this lawsuit within days of its filing, the ready access by hyperlink to the summons and complaint in several of the articles, and the attempts made by several reporters to contact the defendants for comment as indicated above, it is reasonable to conclude that Ricciardi and Demos were aware of this lawsuit and its allegations within days of its filing.

Dated this 31st day of May, 2019



Michael C Griesbach